1 2 3 4 5 6 7 8	ALEX G. TSE, CSBN 152348 United States Attorney DEBORAH LEE STACHEL Regional Chief Counsel, Region IX Social Security Administration TINA L. NAICKER, CSBN 252766 Special Assistant United States Attorney 160 Spear Street, Suite 800 San Francisco, California 94105 Telephone: (415) 268-5611 Facsimile: (415) 744-0134 E-Mail: Tina.Naicker@SSA.gov Attorneys for Defendant	
9	UNITED STATES DISTRICT COURT	
10	NORTHERN DISTRICT OF CALIFORNIA	
11		Case No.: 4:18-cv-01764-KAW
12	ELVIRA ALEJANDRE PONCE GARCIA,	JOINT STIPULATION AND
13	Plaintiff, )	<del>[PROPOSED]</del> ORDER FOR EXTENSION OF TIME TO FILE AND SERVE
14 15	VS. ) NANCY A. BERRYHILL, ) Acting Commissioner of Social Security )	ANSWER, CERTIFIED ADMINISTRATIVE RECORD, AND TO MODIFY BRIEFING SCHEDULE.
16	Defendant.	
17	j )	
18		
19	IT IS HEREBY STIPULATED, by the p	parties, through their respective counsel of record,
20	that the time for Defendant to file the certified administrative record (CAR) and Answer to	
21	Plaintiff's Complaint be extended from October 11, 2018 to October 24, 2018. This is	
22	Defendant's second request for extension. Good cause exists to grant Defendant's request for	
23	extension. Defendant needed additional time for the preparation of the paper Certified	
24	Administrative Record (CAR) and for attorney review following receipt of the CAR to prepare	
25	the Answer and/or responsive pleading. Defendant makes this request in good faith with no	
26	intention to unduly delay the proceedings. Defendant apologizes for the belated request for	
27	extension, but was out on sick leave from the flu/acute pneumonia and sought an additional	
28		
	JS for Extension of Time and PO;	Case No. 4:18-cv-01764-KAW

1	extension of time as soon as reasonably practicable. The parties further stipulate that the Court's	
2	Scheduling Order shall be modified acco	ordingly.
3		
4		Respectfully submitted,
5		
6	Dated: October 24, 2018	/s/ Steven Rosales (*as authorized by email by legal assistant E. Perez
7		on October 23, 2018) STEVEN ROSALES
8		Attorney for Plaintiff
9		
10	Dated: October 24, 2018	ALEX G. TSE
11		Acting United States Attorney DEBORAH LEE STACHEL
12		Regional Chief Counsel, Region IX
13		Social Security Administration
14	Ву	·
15		TINA L. NAICKER Special Assistant U.S. Attorney
16		Attorneys for Defendant
17		ODDED
18		<u>ORDER</u>
19	APPROVED AND SO ORDERED:	
20   21		
22		Kandis Westende
23	DATED: 10/24/18	THE HONORABLE KANDIS A. WESTMORE
24		UNITED STATES MAGISTRATE JUDGE
25		
26		
27		
28		
_~		

Case No. 4:18-cv-01764-KAW

JS for Extension of Time and PO;